

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION**
Washington, DC 20554

In the Matter of)	
)	
Telecommunications Carriers Eligible to Receive)	WC Docket No. 09-197
Universal Service Support)	
)	
O1 Communications, Inc.)	
)	
Petition for Designation as a Lifeline Broadband)	
Provider Eligible Telecommunications Carrier)	
)	

**O1 COMMUNICATIONS, INC. AND INTER VISTA NETWORKING, INC.
JOINT PETITION FOR DESIGNATION AS A LIFELINE BROADBAND
PROVIDER ELIGIBLE TELECOMMUNICATIONS CARRIER**

Michel Singer Nelson, Esq.
Counsel and VP of Regulatory and
Public Policy
O1 Communications, Inc.
4359 Town Center Blvd., Suite 217
El Dorado Hills, CA 95762
mnelson@o1.com
916-235-2028

I. INTRODUCTION

O1 Communications, Inc. ("O1") jointly with its affiliate, Inter Vista Networking, Inc. ("Inter Vista") (collectively, "O1 Petitioners"), pursuant to Section 214(e) of the Communications Act of 1934 as amended ("Act") and Sections 54.201 and 54.202 of the rules of the Federal Communications Commission ("FCC" or "Commission"), hereby request designation as a Lifeline Broadband Provider ("LBP") eligible telecommunications carrier ("ETC") in California for the purpose of receiving universal service Lifeline support for the provision of broadband Internet access service ("BIAS").¹

Designating O1 as a LBP ETC will further the Commission's overarching policy goals of "ensur[ing] the availability of broadband service for low-income Americans,"² and "encourage[ing] market entry and increase[ing] competition among Lifeline providers."³ The O1 Petitioners provide Voice over Internet Protocol ("VoIP"), broadband and dial up Internet access services throughout California. Inter Vista has provided Internet access services predominantly through dial up services, since 1999 and currently provides BIAS services to more than 400 customers. In addition, O1 plans to partner with California county offices of education to provide BIAS services to thousands of qualifying low income students living in underserved and unserved areas of California through various technologies including fixed wireless networks. Accordingly, O1 is willing to offer BIAS services to qualifying low

¹ *Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket Nos. 11-42, 09-197, 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Red 3962 (2016) ("*Lifeline Modernization Order*").

² See *Wireline Competition Bureau Provides Guidance Regarding Designation as a Lifeline Broadband Provider and Lifeline Broadband Minimum Service Standards*, WC Docket No. 11-42 et al., Public Notice DA 16-1118, ¶11 (WCB Sept. 6) ("*LBP Public Notice*").

³ *Lifeline Modernization Order* at para. 29.

income households in the Designated Service Area, which is described in Exhibit A to this Petition. The granting of O1's Petition will promote the public interest and particularly the Commission's primary goal for the newly reformed BIAS-centric Lifeline program by expanding "the availability of broadband service for low-income Americans."⁴ Pursuant to the Commission's *Lifeline Modernization Order*, as discussed in more detail below, O1 satisfies the requirements for designation as an LBP ETC and is able and prepared to offer Lifeline-supported BIAS service throughout the Designated Service Area.

II. OVERVIEW

O1 and Inter Vista are incorporated in the State of California with principal offices located at 4359 Town Center Blvd., El Dorado Hills, CA 95762. The O1 Petitioners have been providing Internet access services since 1999 through dial up services, primarily in rural areas and smaller cities where broadband Internet access services have not been widely available. Recently, O1 has expanded its Internet access offerings to include BIAS. In addition, through its partnership with California school districts, O1 plans to serve low income students living in underserved and unserved territories of the state, who will be directly benefitted by O1's offering of BIAS. O1 currently receives no Lifeline or other universal service program benefits on behalf of its customers.

III. O1 MEETS THE REQUIREMENTS FOR LIFELINE BROADBAND PROVIDER ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION

As described below, O1 satisfies all of the statutory and regulatory requirements for designation as a LBP ETC in the proposed Designated Service area and has provided a discussion of each requirement below.

⁴ *Id.* at para. 29.

A. The FCC has authority to grant the request designation.

In the *Lifeline Modernization Order*, the Commission created a "unified, streamlined FCC ETC designation process for providers seeking to receive reimbursement for providing BIAS."⁵ The Commission further found that individual state designations for the LBP ETC designation "would thwart federal universal service goals and broadband competition," and accordingly preempted such state designations."⁶ The O1 Petitioners seek to provide BIAS service to consumers throughout the proposed Designated Service Area. The Petitioners are not subject to state ETC designation jurisdiction for this purpose and they are permitted to seek designation as a LBP ETC for the Designated Service Area directly from the Commission.⁷

B. O1 certifies that it will comply with the service requirements applicable to Lifeline Support (47 C.F.R. §54.202(a)(1)).

Pursuant to 47 C.F.R. §54.202(a)(1)(i), the O1 Petitioners hereby certify that they will comply with all the service requirements, including all applicable minimum service standards applicable to Lifeline support under the Commission's revised rules.⁸

As described throughout this Petition, O1's Inter Vista affiliate currently provides BIAS service. At present, Inter Vista offers BIAS at speeds of up to 6 Mbps in certain areas and in the Designated Service Area, plans to offer services meeting the minimum speed service standards for broadband starting at 10 Mbps for download and 1 Mbps for upload. Inter Vista does not currently enforce a forced fixed maximum monthly data usage limit and if it does so in the future, it agrees that such limit will be equal to or exceed the minimum Lifeline service

⁵ *Id.* at para. 239.

⁶ *Id.* at para. 229.

⁷ *Id.* at paras. 229-273.

⁸ 47 C.F.R. §54.202.

requirements as determined by the Commission. The O1 Petitioners have established detailed and comprehensive procedures to ensure service is provided in compliance with Lifeline requirements, and should they be necessary, the O1 Petitioners will implement additional compliance procedures from time to time to further ensure their Lifeline-supported broadband services are offered in compliance with Commission rules. The O1 Petitioners commit to provide compliant BIAS service to all qualified low income consumers throughout the proposed Designated Service Area, even as the minimum service standards for qualifying BIAS are updated annually.⁹

C. O1 will remain functional in Emergency Situations (47 C.F.R. §54.202(a)(2)).

The O1 Petitioners commit to remaining functional in emergency situations, and certify that the network over which their BIAS service is provided is capable of remaining functional in such situations.¹⁰ Specifically, the O1 Petitioners have the ability to remain functional in emergency situations, including a reasonable amount of back-up power (typically, 3-4 hours) to ensure functionality without an external power source, its ability to reroute traffic around damaged facilities and manage traffic spikes resulting from emergency situations.

D. O1 will satisfy Applicable Consumer Protection and Service Quality Standards (47 C.F.R. §54.202(a)(3)).

The O1 Petitioners commit to continuing compliance with all applicable service quality standards and consumer protection rules.¹¹ Specifically the O1 Petitioners certify that they will comply with all applicable state and federal consumer protection and service quality standards, that they understand their consumer protection obligations under the Communications Act and its

⁹ See *LBP Public Notice*.

¹⁰ 47 C.F.R. §54.202(a)(2).

¹¹ 47 C.F.R. §54.202(a)(3).

implementing rules, including, but not limited, to any applicable rules regarding unjust or unreasonable practices, discrimination, and relevant enforcement provisions in the Act and the Commission's rules, and are prepared to comply with those obligations and any future amendments or additions thereto.

E. O1 is Financially and Technically capable of providing Lifeline Service in compliance with the Commission's rules (47 C.F.R. §54.202(a)(4)).

The O1 Petitioners are financially and technically qualified to provide Lifeline-supported BIAS in compliance with the Commission rules, including the program's new minimum service standards, throughout the Designated Service Area.¹² O1 and Inter Vista are privately held companies that have been providing voice and Internet access services since 1998. The companies' ownership has remained virtually unchanged in those nearly 20 years. Two of the three executive officers have been with the companies since the beginning and the third officer has been with the companies for more than 10 years. During the O1 Petitioners' history, they have operated without interruption and have done so in compliance with applicable federal, state, county and municipal rules.

F. Terms and Conditions of O1's Broadband Internet Access Service Plans (47 C.F.R. §54.202(a)(6)).

The O1 Petitioners plan to offer Lifeline subscribers all residential broadband products that are offered to the general public and will do so on the same terms and conditions, including promotional offerings and bundled offerings.¹³ The Petitioners will pass the full amount of Lifeline support through to the Lifeline-eligible subscriber, which will appear as a credit on their

¹² 47 C.F.R. §54.202(a)(4).

¹³ 47 C.F.R. §54.202(a)(6).

monthly invoice.¹⁴ The O1 Petitioners' current prices, terms and conditions are located on Inter Vista's website: www.intervistainternet.com. As additional services are added to meet the minimum speed standards, the Petitioners will post descriptions of those services on its website. As described above, all of the Petitioners' BIAS offerings meet the Commission's minimum service standards.

G. O1 will advertise the availability of the supported service and the charges through media of general distribution (47 U.S.C. §214(e)(1)(B); 47 C.F.R. §54.201(d)(2)).

The O1 Petitioners commit to advertise the availability and cost of its Lifeline BIAS service through media of general distribution.¹⁵ The O1 Petitioners will comply with the advertising, marketing and disclosure requirements set forth in 47 C.F.R. §54.405. Specifically, all of the print and other materials used to describe or enroll their subscribers in the Lifeline service offering will indicate, using easily understood language, that (1) the O1 Petitioners' low-income targeted service is a Lifeline service; (2) Lifeline is a government assistance program; (3) the service is non-transferable; (4) only eligible consumers may enroll in the program; and (5) the program is limited to one discount per household.

H. O1 will comply with all applicable ETC obligations (47 U.S.C. §214(e); 47 C.F.R. §§54.201, 54.202 and Subpart E of Part 54)).

To protect the integrity of the Lifeline program and guard against waste, fraud, and abuse, the O1 Petitioners will comply with the Commission's additional ETC obligations outlined in Sections 54.201 and 54.202 as well as those contained in Subpart E of Part 54 of the rules.¹⁶ Specifically, the O1 Petitioners commit to comply with rules regarding subscriber

¹⁴ 47 C.F.R. §54.403(a)(1).

¹⁵ 47 U.S.C. §214(e)(1)(B); 47 C.F.R. §54.201(d)(2).

¹⁶ 47 U.S.C. §214(e); 47 C.F.R. §§54.201, 54.202, 54.400 et seq.

eligibility verifications, certification, recordkeeping and auditing requirements. With regard to eligibility verification, the O1 Petitioners will certify and recertify subscribers' eligibility for the Lifeline program, including verifying and confirming subscribers' eligibility, in full compliance with existing Section 54.410 of the Commission's rules until the Commission's new National Verifier has been launched in California. Once the National Verifier is launched, the O1 Petitioners will enroll subscribers through the National Verifier pursuant to the new provisions of Section 54.410 and in accordance with all enrollment guidance provided by the Commission or USAC.

**IV. GRANTING O1'S PETITION FOR DESIGNATION AS A LIFELINE
BROADBAND PROVIDER ELIGIBLE TELECOMMUNICATIONS CARRIER
WILL SERVE THE PUBLIC INTEREST**

The Lifeline program serves to further the Act's goals of achieving "quality services" offered at "just, reasonable, and affordable rates" for low income consumers.¹⁷ In finding that broadband is a supported service for purposes of the Lifeline program, the Commission determined that by expanding "the availability of broadband service for low-income Americans," an ETC is inherently acting in the public interest. Designation of O1 as a LBP ETC will serve the overall public interest, and will benefit low income consumers in the Designated Service Area by provisioning high quality broadband service at a reasonable cost to Lifeline subscribers.

The O1 Petitioners' principle service areas are smaller cities and towns and rural unincorporated communities. In their experience, the cost of broadband services is a barrier to many households within its service areas. By offering a subsidized broadband service, the O1 Petitioners expect that many additional households will be able to afford broadband services,

¹⁷ 47 U.S.C. §254(b)(1).

thus furthering the Commission's goal of reaching those American households with limited financial means.

V. ANTI-DRUG ABUSE CERTIFICATION

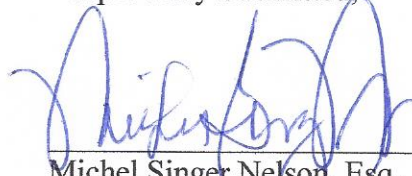
O1 certifies that no party to this Petition is subject to a denial of federal benefits that includes Commission benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862.

VI. CONCLUSION

O1 certifies that its Petition for LBP ETC Designation fully satisfies the conditions set forth in the Communications Act, the Commission's rules pertaining to Lifeline and the *Lifeline Modernization Order*. Accordingly, O1 respectfully requests approval of its LBP ETC Designation Petition so that the O1 Petitioners may provide BIAS to eligible low-income customers in the Designated Service Area.

Dated this 21st day of February 2017.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Michel Singer Nelson", is written over a horizontal line.

Michel Singer Nelson, Esq.
Counsel and VP of Regulatory and Public Policy
O1 Communications, Inc.
4359 Town Center Blvd., Suite 217
El Dorado Hills, CA 95762
916 235 2028
mnelson@o1.com

Exhibit A

90001	90059	90293	90746	91307	91607	91901	92064	92140	92309
90002	90061	90301	90747	91311	91608	91902	92065	92145	92310
90003	90062	90302	90755	91316	91701	91905	92066	92147	92311
90004	90063	90303	90802	91320	91702	91906	92069	92154	92313
90005	90064	90304	90803	91321	91706	91910	92070	92155	92314
90006	90065	90305	90804	91324	91708	91911	92071	92173	92315
90007	90066	90401	90805	91325	91709	91913	92075	92194	92316
90008	90067	90402	90806	91326	91710	91914	92078	92201	92320
90010	90068	90403	90807	91330	91711	91915	92081	92203	92323
90011	90069	90404	90808	91331	91722	91916	92082	92210	92324
90012	90071	90405	90810	91335	91723	91917	92083	92211	92327
90013	90077	90501	90813	91340	91724	91932	92084	92220	92328
90014	90079	90502	90814	91342	91730	91934	92086	92223	92332
90015	90089	90503	90815	91343	91731	91935	92091	92225	92335
90016	90094	90504	91001	91344	91732	91941	92092	92227	92336
90017	90095	90505	91006	91345	91733	91942	92093	92230	92337
90018	90201	90601	91007	91350	91735	91945	92101	92231	92339
90019	90210	90602	91008	91351	91737	91950	92102	92233	92342
90020	90211	90603	91010	91352	91739	91962	92103	92234	92344
90021	90212	90604	91011	91354	91740	91963	92104	92236	92345
90022	90220	90605	91016	91355	91741	91977	92105	92240	92346
90023	90221	90606	91020	91356	91744	91978	92106	92241	92347
90024	90222	90620	91024	91360	91745	91980	92107	92242	92350
90025	90230	90621	91030	91361	91746	92003	92108	92243	92354
90026	90232	90623	91040	91362	91748	92004	92109	92249	92356
90027	90240	90630	91042	91364	91750	92007	92110	92250	92358
90028	90241	90631	91101	91367	91752	92008	92111	92251	92359
90029	90242	90638	91103	91377	91754	92009	92113	92252	92363
90031	90245	90639	91104	91381	91755	92010	92114	92253	92364
90032	90247	90640	91105	91384	91761	92011	92115	92254	92365
90033	90248	90650	91106	91387	91762	92014	92116	92256	92368
90034	90249	90660	91107	91390	91763	92019	92117	92257	92371
90035	90250	90670	91108	91401	91764	92020	92118	92260	92372
90036	90254	90680	91125	91402	91765	92021	92119	92262	92373
90037	90255	90701	91126	91403	91766	92024	92120	92264	92374
90038	90260	90703	91201	91405	91767	92025	92121	92267	92376
90039	90262	90706	91202	91406	91768	92026	92122	92270	92377
90040	90263	90710	91203	91411	91770	92027	92123	92274	92392
90041	90265	90712	91204	91423	91773	92028	92124	92276	92394
90042	90266	90713	91205	91436	91775	92029	92126	92277	92395
90043	90270	90715	91206	91501	91776	92036	92127	92278	92397
90044	90272	90716	91207	91502	91780	92037	92128	92281	92399
90045	90274	90717	91208	91504	91784	92040	92129	92282	92401
90046	90275	90720	91210	91505	91786	92054	92130	92283	92404
90047	90277	90723	91214	91506	91789	92055	92131	92284	92405
90048	90278	90731	91301	91601	91790	92056	92132	92285	92407
90049	90280	90732	91302	91602	91791	92057	92134	92301	92408
90056	90290	90740	91303	91604	91792	92058	92135	92305	92410
90057	90291	90744	91304	91605	91801	92059	92136	92307	92411
90058	90292	90745	91306	91606	91803	92061	92139	92308	92414

Exhibit A

92415	92617	92807	93065	93266	93453	93615	93723	94063	94403
92418	92618	92808	93066	93267	93454	93616	93724	94065	94404
92501	92620	92809	93101	93268	93455	93618	93725	94066	94501
92503	92624	92821	93103	93270	93458	93619	93726	94070	94502
92504	92625	92823	93105	93271	93460	93620	93727	94074	94503
92505	92626	92831	93106	93272	93461	93621	93728	94080	94505
92506	92627	92832	93108	93274	93463	93622	93730	94085	94506
92507	92629	92833	93109	93277	93465	93623	93740	94086	94507
92508	92630	92835	93110	93280	93501	93625	93888	94087	94508
92509	92637	92840	93111	93283	93505	93626	93901	94089	94509
92518	92646	92841	93117	93285	93510	93628	93905	94101	94510
92521	92647	92843	93202	93286	93512	93630	93906	94102	94512
92522	92648	92844	93203	93287	93513	93631	93907	94103	94513
92530	92649	92845	93204	93291	93514	93635	93908	94104	94514
92532	92651	92860	93205	93292	93516	93636	93920	94105	94515
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92548	92661	92869	93219	93308	93529	93644	93930	94111	94523
92549	92662	92870	93221	93309	93531	93645	93933	94112	94525
92551	92663	92879	93223	93311	93532	93646	93940	94114	94526
92553	92672	92880	93224	93312	93534	93647	93943	94115	94530
92555	92673	92881	93225	93313	93535	93648	93950	94116	94531
92557	92675	92882	93226	93314	93536	93650	93953	94117	94533
92561	92676	92883	93230	93401	93543	93651	93955	94118	94534
92562	92677	92886	93234	93402	93544	93652	93960	94121	94535
92563	92679	92887	93235	93405	93545	93653	94002	94122	94536
92567	92683	93001	93238	93409	93546	93654	94005	94123	94538
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92582	92692	93009	93241	93422	93552	93660	94015	94128	94542
92583	92694	93010	93242	93426	93553	93662	94019	94129	94544
92584	92697	93012	93243	93427	93555	93664	94020	94130	94545
92585	92701	93013	93244	93428	93560	93667	94021	94131	94546
92586	92703	93015	93245	93430	93561	93668	94022	94132	94547
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92590	92705	93022	93247	93433	93563	93675	94025	94134	94550
92591	92706	93023	93249	93434	93591	93701	94027	94143	94551
92592	92707	93030	93250	93436	93601	93702	94028	94145	94552
92595	92708	93033	93251	93437	93602	93703	94030	94158	94553
92596	92780	93035	93252	93442	93603	93704	94038	94163	94555
92602	92782	93036	93254	93444	93604	93705	94040	94301	94556
92603	92799	93041	93255	93445	93608	93706	94041	94303	94558
92604	92801	93042	93256	93446	93609	93710	94043	94304	94559
92606	92802	93043	93257	93449	93610	93711	94044	94305	94560
92610	92804	93060	93260	93450	93611	93720	94060	94306	94561
92612	92805	93063	93263	93451	93612	93721	94061	94401	94563
92614	92806	93064	93265	93452	93614	93722	94062	94402	94564

Exhibit A

94565	94710	95033	95193	95326	95407	95326	95407	95485	95607
94566	94720	95035	95202	95327	95409	95327	95409	95488	95608
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94568	94803	95039	95204	95329	95412	95329	95412	95492	95612
94571	94804	95043	95205	95330	95415	95330	95415	95493	95614
94572	94805	95045	95206	95333	95417	95333	95417	95494	95615
94574	94806	95046	95207	95334	95420	95334	95420	95501	95616
94576	94901	95050	95209	95335	95421	95335	95421	95503	95618
94577	94903	95051	95210	95336	95422	95336	95422	95511	95619
94578	94904	95053	95211	95337	95423	95337	95423	95514	95620
94579	94920	95054	95212	95338	95425	95338	95425	95519	95621
94580	94922	95060	95215	95340	95427	95340	95427	95521	95623
94582	94923	95062	95219	95341	95428	95341	95428	95524	95624
94583	94924	95064	95220	95345	95429	95345	95429	95525	95626
94585	94925	95065	95222	95346	95432	95346	95432	95526	95627
94586	94928	95066	95223	95348	95436	95348	95436	95527	95628
94587	94930	95070	95228	95350	95437	95350	95437	95528	95629
94588	94931	95073	95230	95351	95439	95351	95439	95531	95630
94589	94937	95075	95231	95354	95441	95354	95441	95532	95631
94590	94939	95076	95232	95355	95442	95355	95442	95536	95632
94591	94940	95110	95236	95356	95443	95356	95443	95540	95633
94592	94941	95111	95237	95357	95444	95357	95444	95542	95634
94595	94945	95112	95240	95358	95445	95358	95445	95543	95635
94596	94946	95113	95242	95360	95446	95360	95446	95546	95636
94597	94947	95116	95245	95361	95448	95361	95448	95547	95637
94598	94949	95117	95246	95363	95449	95363	95449	95548	95638
94599	94951	95118	95247	95364	95450	95364	95450	95549	95640
94601	94952	95119	95249	95365	95451	95365	95451	95550	95641
94602	94954	95120	95251	95366	95452	95366	95452	95551	95642
94603	94956	95121	95252	95367	95453	95367	95453	95552	95645
94605	94960	95122	95255	95368	95454	95368	95454	95554	95648
94606	94965	95123	95257	95369	95456	95369	95456	95555	95650
94607	94970	95124	95258	95370	95457	95370	95457	95558	95651
94608	94972	95125	95301	95372	95458	95372	95458	95560	95652
94609	94974	95126	95303	95374	95459	95374	95459	95562	95655
94610	95003	95127	95304	95376	95460	95376	95460	95564	95658
94611	95004	95128	95306	95377	95461	95377	95461	95565	95659
94612	95005	95129	95307	95379	95462	95379	95462	95567	95660
94617	95006	95130	95310	95380	95463	95380	95463	95568	95661
94618	95008	95131	95311	95382	95464	95382	95464	95569	95662
94619	95010	95132	95313	95383	95465	95383	95465	95570	95663
94621	95012	95133	95315	95385	95466	95385	95466	95573	95664
94702	95014	95134	95316	95386	95467	95386	95467	95585	95665
94703	95017	95135	95317	95388	95468	95388	95468	95587	95666
94704	95018	95136	95320	95389	95469	95389	95469	95589	95667
94705	95019	95138	95321	95391	95470	95391	95470	95595	95668
94706	95020	95139	95322	95401	95472	95401	95472	95602	95669
94707	95023	95140	95323	95403	95476	95403	95476	95603	95670
94708	95030	95141	95324	95404	95480	95404	95480	95605	95671
94709	95032	95148	95325	95405	95482	95405	95482	95606	95672

Exhibit A

95673	95830	95965	96047	96133
95674	95831	95966	96048	96134
95677	95832	95968	96050	96136
95678	95833	95969	96051	96137
95681	95834	95970	96052	96146
95682	95835	95971	96055	96150
95683	95837	95972	96056	96161
95684	95838	95973	96057	
95685	95841	95975	96058	
95687	95842	95977	96059	
95688	95843	95979	96062	
95689	95864	95981	96064	
95690	95901	95982	96065	
95691	95903	95983	96067	
95692	95910	95987	96069	
95693	95912	95988	96071	
95694	95914	95991	96073	
95695	95916	95993	96075	
95703	95917	96001	96076	
95709	95918	96002	96080	
95713	95919	96003	96085	
95720	95920	96006	96086	
95722	95922	96007	96088	
95726	95923	96008	96091	
95735	95925	96010	96094	
95742	95926	96013	96096	
95746	95928	96014	96097	
95747	95929	96015	96101	
95757	95930	96016	96103	
95758	95932	96017	96104	
95762	95934	96019	96105	
95765	95935	96020	96107	
95776	95938	96021	96108	
95811	95939	96022	96109	
95814	95941	96023	96112	
95815	95942	96024	96114	
95816	95943	96025	96115	
95817	95945	96027	96117	
95818	95946	96028	96118	
95819	95947	96029	96120	
95820	95948	96031	96121	
95821	95949	96032	96122	
95822	95953	96033	96123	
95823	95954	96034	96124	
95824	95957	96035	96125	
95825	95959	96038	96126	
95826	95960	96039	96128	
95827	95961	96040	96129	
95828	95962	96041	96130	
95829	95963	96044	96132	